

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION

IN THE MATTER OF THE APPLICATION OF THE )  
UNITED STATES OF AMERICA FOR AN ARREST )  
WARRANT )  
)  
)

Misc. No. 8-22-mj-24

(UNDER SEAL)

**MOTION TO SEAL**

The United States of America, by and through its undersigned Assistant United States Attorney, hereby moves this Court to seal the Affidavit and Application, and Warrant submitted in support of an arrest warrant. The Court has the inherent authority to seal these documents. *See Baltimore Sun v. Goetz*, 886 F. 2d 60 (4th Cir. 1988). The purpose of the Government's request is to protect the information contained within the Affidavit and Application, and Warrant to avoid the disclosure of the details of the investigation at this time, to protect the destruction of evidence, and to minimize danger to the public and law enforcement.

Based on the facts in the Affidavit and Application, and Warrant, there is reason to believe that disclosure of the information included in the Affidavit and Application, and Warrant could seriously jeopardize the investigation by giving the target the opportunity to destroy or tamper with evidence, change patterns of behavior, flee from prosecution, intimidate cooperating and potential witnesses, and endanger the safety of law enforcement and other individuals. For these reasons, the Government submits that the interests in sealing the Affidavit and Application associated with this order, outweigh the common-law public right of access and that sealing is "essential to preserve higher values." *See Media Gen. Operations, Inc. v. Buchanan*, 417 F.3d 424, 429-31 (4th Cir. 2005). Given the fact that the Affidavit and Application will be disclosed subsequent to the arrest of any target of the investigation the

Government submits that the sealing is narrowly tailored to serve the Government's interests.  
*Id.* at 429.

Based on the foregoing, the Government requests that the Affidavit and Application, and Warrant associated with the arrest warrant be filed under seal except that working copies should be made available to the FBI, the United States Attorney's Office, the Department of Justice, and any other law enforcement agency designated by the United States Attorney's Office or the Department of Justice.

Respectfully submitted,

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